

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Cause No. 3:24CR30063 NJR
)
MICHAEL E. MCCAY,)
)
Defendant,)

MOTION TO CONTINUE TRIAL AND RELATED DATES

COMES NOW, Defendant, Mr. Michael E. McCay, by and through counsel, and requests to continue his Trial now set for June 18, 2024 and his Final Pretrial Conference now set on June 11, 2024. In support of his Motion to Continue, Defendant states as follows:

1. Defendant is charged in the above styled cause with two counts sexual exploitation of a minor and one count distribution of child pornography in violation of 18U.S.C. §§2251 and 2252A.
2. Defendant was arraigned on April 19, 2024 and remains detained. (Doc. 8; 16).
3. Defendant's case is now set for trial just 60 days past his arraignment. Defendant needs additional time to review discovery, including some discovery that must be reviewed solely at the United States Attorneys Office, and investigate the case further.
4. Defendant therefore requests a Continuance of his Trial and Related Dates.
5. Defendant's request for Continuance of Trial and related dates is made in the interest of justice and is not intended to vex or delay this Court. Defendant's request for additional time outweighs the interest of the public and the defendant in a speedy trial as set out in 18 U.S.C. §3161(h)(7) and Defendant is aware that this time will be excluded from computation under the Speedy Trial Act.

WHEREFORE Defendant requests this Honorable Court grant his Motion to Continue Trial and Related Dates for at least 60 and for any additional relief that this Court deems just and proper.

Respectfully submitted,

/s/ Kim C. Freter

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